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AUTHOR Stumme, James M.
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ABSTRACT

The monograph is intended to help school psychologists understand the special procedures, techniques, and considerations necessary for providing effective courtroom interventions, specifically expert testimony and written reports. Beginning with an explanation of lay and expert witnesses, the monograph goes on to stress the importance of pretrial preparation factors: information gathering; information dissemination; utilization of files, records, and face sheets; legal consultation and preparation; presentation of professional credentials; use of visual aids; courtroom conditioning; and dress and demeanor in court. The direct examination is then described and information provided on the adversarial process, advocacy, and responses to questions. Cross-examination, including common traps used by attorneys, is analyzed Report writing is briefly reviewed in terms of its components and its differences from the traditional psychological report. A sample written court report and one page of references concludes the document. (CL)

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Courtroom Practice Guidelines for School Psychologists:

Expert Testimony and Report Writing

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Courtroom Practice Guidelines for School Psychologists: Expert Testimony and Report Writing

James M. Stumme, Ed.D.

School Psychologist

Heartland AEA 11

Ames, Iowa

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INTRODUCTION

School psychologists are becoming increasingly involved in the legal system and are called upon to testify regarding psychological evaluations, treatment procedures, special education programs, and to make recommendations regarding particular cases. In addition school psychologists are involved in less direct legal matters such as giving professional opinions on what constitutes acceptable professional practice (Shapiro, 1984). For example, a school psychologist may be requested to evaluate for a malpractice suit whether a mental health practitioner demonstrated acceptable professional practice. Similarly, another related role the school psychologist can serve is that of consultant to the legal system in the form of reviewing and critiquing a psychological evaluation/intervention performed by another professional for the specific purpose of furnishing the opposing attorney with information for cross examination.

Unfortunately, traditional school psychology training programs do not provide practitioners with knowledge or practice which will prepare them to provide adequate court interventions. Graduate coursework on professional issues and ethical concerns tend not to present more than perfunctory treatment of the role of the school psychologist in the legal system, the psychologist/lawyer/client relationship, or the expert witness role. Tymchuk, Drapkin, Major-Kingsley, Ackerman, Coffman, & Baum (1982) concluded from a survey to clinical psychologists that only 37% of the survey participants received formal, structured modes of learning in professional issues and ethics. The naive practitioner may unknowingly plunge from the relative safety of their daily routine and familiar school territory into the unknown legal arena and threatening environment of the witness stand. Once on the witness stand the school psychologist can potentially have their credentials belittled, their testimony rigorously interrogated, their opinion subject to ridicule, and if not thoroughly prepared and schooled in the ways of the court, their self-esteem and professional credibility tarnished. It is in this context that this monograph has been written.

The purpose of this paper is to acquaint the school psychologist with the special procedures, techniques, and considerations necessary for providing effective courtroom interventions. More specifically, this paper will address the most common court interventions rendered by school psychologists, namely, the provision of expert testimony and how to construct and submit written reports.

THE EXPERT WITNESS

The essential purpose of any testimony is to provide useful and relevant information to the court to assist them in making an informed legal decision (Schwitzgebel & Schwitzgebel, 1980). Hopefully this process can be accomplished with a minimum amount of stress on the expert witness. This is possible only when the expert witness is knowledgeable of the court process and is adequately prepared. An uninformed and unprepared witness is at the unforgiving mercy of the adversarial counsel. The following information, suggestions, and considerations are presented to assist the school psychologist in their preparation to assume the role of the expert witness.

The Lay Witness Defined

There are two distinct categories of witnesses. The lay witness and the expert witness.

The lay witness may testify only to phenomena which they have legitimately seen, heard, felt, tasted, or smelled directly. The general rule is that the lay witness is prohibited from testifying about anything other than that gained from personal perception (Westphal & Kohn, 1984). A lay witness may not testify to their opinions or inferences unless the court finds that these can be rationally based on the perception of the witness and which are helpful to understanding their testimony. "Thus, lay opinion evidence as to distance, time, speed, size, weight, direction, form and identity are admitted; if such opinions are of a type which a normal person forms constantly and correctly, ..." (Cook, 1964, p. 459). Expressing conclusions is not within the scope of the lay witness and is, in fact, the function and burden of the court.

The Expert Witness Defined

In contrast to the lay witness who may testify primarily only to firsthand perceptual knowledge, the expert witness may formulate and testify to professional opinion and can draw inferences from data. Experts are asked to testify because they have special knowledge, training, and/or experience beyond that of a lay person. They possess something unique to contribute. The expert witness is limited, however, to opinions or inferences which are perceived by, or personally known to the witness. The information presented must also be within the scope of the witness' special training, skill and experience to interpret, and be of direct aid to the court (Cook, 1964). To demonstrate the professional specificity of testimony, consider the expert witness who may be requested to testify in a criminal case on "how the development, adaptations, and function, of [the] defendant's behavior processes may have influenced his conduct." (Washington v. United States, 1967). Or in a civil commitment hearing the expert might be asked to "explain the development and manifestations of the alleged mental illness and also probably to make a prediction about the individual's 'dangerousness' to self or others" (Schwitzgebel & Schwitzgebel, 1980, p. 238). Although specificity is necessary to address many professional issues this should be tempered with explanations that the lay public can understand. Simply asserting a professional conclusion (e.g., the individual suffers from schizophrenia) is not, in and of itself, adequate (Carter v United States, 1957). In essence, expert testimony is admitted only when it assists the trier of fact (a jury or magistrate in a non-jury trial) to understand and analyze evidence or to determine a fact (Federal Rules of Evidence Rule 702).

Brodsky and Robey (1972) describe and examine two extremes of expert witness behavior exhibited by mental health care professionals. They dichotomize these two distinct groups as the courtroom-oriented expert witness and the courtroom-unfamiliar expert witness. The courtroom-oriented witnesses are portrayed as behaving in desirable ways while the courtroom-unfamiliar witnesses conduct themselves in comparatively undesirable ways. Gorlow (1975) summarizes the former as possessing some legal training, having some knowledge of the law, displaying a minimal emotional reaction to subpoena, speaking in clear and concise language avoiding jargon, and representing their position with restrained advocacy. Gorlow characterizes the courtroom-unfamiliar witness as possessing no relevant legal training, as unaware of law and evidence rules, showing personal distress in response to subpoena, representing their findings in technical jargon, demonstrating fierce advocacy, and responding with resentment and anger to cross-examination.

Prior to authorizing an expert witness to express an opinion, inference, or conclusion the court must be assured of two prerequisite conditions: (a) The expert testimony is necessary to fully understand the evidence or to determine a fact in evidence, and (b) the expert witness possesses the necessary credentials to adequately form an opinion, inference, or conclusion (Westphal & Kohn, 1984). The requirements needed by a school psychologist to meet the specific qualifications of an expert

witness differ from case to case and range from the most rigorous credential inquiry to a cursory review. In a case cited by Schwitzgebel and Schwitzgebel (1980) the conviction of an accused murderer was reversed in part because the prosecutions' psychologist did not possess a Ph.D. degree, five years of post-graduate training in clinical psychology, and a one year American Psychological Association - approved internship. Nonetheless, since each case is handled differently, the chief factor in determining the credentials required of the expert witness is the matter before the court. If, for example, the case involves expertise in the area of the most appropriate and least restrictive alternative in special education placement, the school psychologist might be deemed by the court to have specialized qualifications and, indeed, an expert worthy of testimony.

Even if a particular psychologist is considered an utmost authority on a given case they must be adequately prepared for their courtroom appearance. If not, the results could be disastrous. The court system is not kind or sympathic with the unprepared.

Pretrial Preparation

Optimal courtroom performance is accomplished through the combination of implementing competent best practices in the delivery of all pretrial professional services and in thoroughly preparing testimony material prior to taking the witness stand. Diligent pretrial preparation greatly alleviates harmful courtroom stress, is ethically responsible, and can have a potentially positive impact on the esteem others hold for the profession of psychology. Adequate pretrial preparation covers a wide diversity of activities which includes the following:

Selection of the Expert Witness. A psychologist may be requested to testify as an expert by the court system or by attorneys representing either the plaintiff or defendant. An expert might be chosen because of past work with a client or because of a specialization area they may possess, such as: assessment of chemical abuse; assessment of child abuse; or knowledge about developmental disabilities. Some jurisdictions even retain organized pools of mental health experts which they reimburse on a fee-per-case basis (Schwitzgebel & Schwitzgebel, 1980).

Information Gathering. Just a word of caution. No pretrial preparation is complete without scrutinizing all gathered information for possible trouble spots or holes. Any questions that are unanswered should be answered. It is better to tackle these during preparation than during cross-examination. Any information gaps can furnish the opposing counsel with ammunition to contest the expert's credibility and ensuring testimony. A cursory reading of a record can cause the expert to miss some important point(s) which can greatly discredit testimony on the stand (Shapiro, 1984). In addition to checking records and other gathered material the expert witness must make sure the person seen was the person referred. There are examples of mistaken identity. The expert providing testimony should never leave the session during an assessment nor should an associate, assistant, practicum student, or intern be allowed to administer an examination. The expert witness must be confident of the source of information to avoid any suggestion by the opposition that an outsider wrongfully prejudiced the results (Schwitzgebel & Schwitzgebel, 1980).

Information Dissemination. In both civil and criminal cases all parties are allowed the opportunity to receive the names of expert witnesses and their findings, prior to their testimony, which eliminates any unexpected relevations. In fact, some court systems require the attorney to list their witnesses, a summary of their evidence, an estimate of the time required for witnesses' testimony and the intended order in which the witnesses will be called; all in written form to be submitted to the court prior to even a pretrial conference (Cook, 1964). Although it might be appropriate to dialog with the opposing lawyer, it is imperative that the expert witness contact the client's attorney prior to the meeting to allow them to attend if they so choose. Conservative practice would dictate that all communication with the opposition's attorney should be conducted through the client's attorney. In the cases of a school hearing the school attorney would need to be notified. No written correspondence should be delivered to the opposition without the expressed written consent of the client's lawyer (Westphal & Kohn, 1984).

With few limitations for restricting the dissemination of expert witnesses' findings there is some danger that information harmful to the client's case will be obtained by the opposition. This information can potentially help the opposition to both build a case against the client and find weak areas in the expert witness' testimony. However, it should be noted that there is a thin line between professional conduct as an expert witness and advocacy. It is unethical for a psychologist to misrepresent testimony for a client's cause. By concealing information the expert witness becomes an advocate of the client rather than an advocate of the facts. The former constitutes questionable ethical practice.

Utilization of Files, Records, and the Face Sheet. Any files, records, or personal notes that are brought to the witness stand by the expert witness can be obtained by counsel for the opposition and used as fuel for cross-examination. The opposition simply asks to have the expert's files and records admitted as an exhibit so that the court may more thoroughly examine them. Because of this open record policy, the expert witness should bring with them only file and record information which will assist them in their testimony and which will hold up under the most exhaustive adversarial scrutiny. File information which is not relevant to the case should not be brought to the witness stand as it can be a source of potential embarrassment to the client and make it difficult for the expert witness to stay within ethical boundaries. According to Shapiro (1984) one of the favorite ploys in cross-examination is for the attorney to ask the expert witness if the notes they have on their person are all of the notes that they took during the examination. The cross-examining attorney will then obtain the notes and compare them to the written report submitted by the expert. Any notes left out of the report will then be attacked in a highly accusatory manner in which the expert witness will be requested to state why some notes were included and interpreted in the report and others were not. One defense strategy for this tactic is for the expert witness to take only carefully selected handwritten notes of the file to court. Another defense when discrepant material is found between personal notes and the written report is to state that only that information which, in the expert's opinion, is clinically significant is included in the report (Shapiro, 1984).

Although handwritten notes are preferred by most expert witnesses, there are circumstances when entire files must be taken to the witness stand (i.e., the subpoena of school records). In this situation it is imperative that the expert witness thoroughly know the file and how to quickly locate every piece of information within the file. Moreover, the expert witness must be prepared to defend how opinions and inferences are supported by the documentation within the file and why discrepant information within the file is not considered clinically relevant.

A good tool for organizing written files, records and personal notes is the face sheet. The face sheet is a one-to-two page outline which summarizes quantitative data such as the number of sessions with the client, beginning and ending dates, etc., along with a brief summary of findings, impressions, opinions, conclusions, and recommendations. In addition, it is helpful for the expert witness to list on the face sheet all information which they feel is important to bring out in court. The face sheet can be of great assistance for quick reference when, under the stress of cross-examination, the mind goes blank.

Legal Consultation and Preparation. An important pretrial preparation that should not be overlooked is the consultation between the expert witness and the attorney of the client. This is an educational process. The attorney has been schooled to carefully prepare the expert witness for testimony but may not know how to deal with psychological data. In juvenile cases chances are good that the expert witness will have a young, inexperienced lawyer. The expert witness must educate the lawyer on the

best ways to present this data. Do not assume the client's legal counsel knows what questions to ask or even the best way to ask them. They may not. And if they do not know to ask, the lawyer might ask questions which could harm the expert witness's testimony. An expert witness's testimony might be very strong, but unless the correct material is prompted by the lawyer's questions it will not be heard. Moreover, an expert witness can appear foolish. It is therefore imperative that the expert witness outline for the attorney what information they want to get across. A list of tentative questions to the attorney is certainly appropriate but not if the list contains answers. If answers are included it is considered scripting, and scripted dialog could find its way to the opposition's counsel. The list of questions should allow for responses to be elaborated and systematically build toward the desired culmination. Although it is not appropriate to script dialog, there is nothing wrong with roleplaying possible courtroom scenarios that could occur with the client's counsel.

One problem that must be addressed with respect to consultation with the client's counsel is the accusation that may be made that the lawyer somehow influenced the expert witness's findings. Shapiro (1984) suggests that the expert witness should respond to this by stating that in the course of the pretrial consultation the expert witness communicated their findings to the attorney after they had completed their evaluation and reached an opinion. It is best practice to document the exact dates of services to the client, establishing an opinion, and consulting with the client's lawyer.

Presentation of Professional Credentials. Prior to asking the psychologist to give expert testimony the court must establish that the witness does, in fact, possess the necessary educational credentials and experience to qualify as an expert witness. This will be done on the witness stand and requires careful preparation prior to being sworn in.

The expert witness should meet with the client's attorney and provide them with an outline of credentials or their vita which carefully lists:

formal education and degrees;
specialized training including practica and internships;
areas of research and publication;
professional affiliations and offices held; and
assistantships, fellowships, and work experiences.

Often the attorney will review the expert's credentials one at a time in court to give the expert an opportunity to tell of their expertise and accomplishments. The manner of presentation will in no small way determine the credibility of the expert witness. According to Westphal and Kohn (1984) the psychologist does not need to be world famous or the author of a book on the subject, or even the utmost authority in order to be admitted as an expert. But the psychologist's evaluation methodology and resulting opinions should generally be similar to the conclusions of others in the same field.

The lawyer for the opposition will be afforded the opportunity to cross-examine the expert witness's credentials in order to invalidate or limit the expert's testimony. A strategy for limiting the expert's testimony is to call for a stipulation of qualifications. When the opposing lawyer asks to stipulate they are probably trying to keep the trier of fact from knowing the breadth of the expert witness' qualifications (Shapiro, 1984). This tactic avoids giving the expert witness too much credibility. The psychologist should request the client's attorney to not allow stipulation should it be requested, in order to allow the court to hear the expert witness' credentials.

When actually presenting credentials to the court it is important to not understate or minimize qualifications because the credibility and effectiveness of one's testimony is reliant on them. Likewise, overstatement and arrogance can be detrimental to one's effectiveness as an expert witness.

Use of Visual Aids. Like the clarity and visual impact provided to psychological reports by graphs and charts, visual aids can assist in explaining data to the court system. The salient difference is that the visual aids utilized in the court room must be targeted at a lay population and free from technical jargon. Other than that, courtroom visual aids can run the gamut from large poster presentations to individual handouts.

Courtroom Conditioning. The more familiar the expert witness is with the courtroom environment and principal actors in that environment the better their performance will be. Under ideal conditions it is helpful to visit the specific courtroom and become familiar with the location of the judge's bench, jury box, and witness stand. It is good practice (conditioning) for the expert witness to sit where they will probably sit before being called to testify and practice walking to the witness stand. More than one expert witness has adequately prepared their presentation, worn their most professional suit, and then had their own confidence shaken and their credibility questioned when, as they approached the witness stand, they could not open the gate separating the observers from the trial participants. The unknown can be unnerving! It is important to know as much information as possible before the day of the hearing. For example, if the expert witness is Jewish and they are asked to place their hand on the "Bible" and tell the truth, they will be facing their first dilemma. Another piece of information the expert witness would want to know is whether reporters will be present or any other media coverage is planned. An expert witness can handle almost anything as long as they are informed of possible scenarios ahead of time.

Along with knowledge of the physical environment it is equally important to have information on the identities, roles, and personalities of the other principal actors that the experts witness will interact with in court. For example, in a jury trial the judge will act as referee, the jury will be the decision makers, the lawyers the advocates and persuaders, and the witnesses the information provides. In a non jury trial the judge is both referee and decision maker. More than just

knowing what roles people will play, it is extremely important to know how the specific judge and representing attorneys conduct themselves in court. If, for example, an expert witness knows that an attorney typically tries to intimidate a witness they can be prepared and not take it personally. Likewide, knowing that a lawyer typically sets witnesses up by trapping with them apparently simple questions will alert the expert witness to be cautious. In preparation for testimony law clerks and baliffs can be an excellent source of information on what the judge desires regarding how to most effectively present information and whom to address responses.

Dress and Demeanor in Court. An expert witness's acceptability and credibility are contingent on numerous easily overlooked variables. One influential variable is dress. An expert witness's apparel and accessories should add to their role as a competent expert not diminish the impact of their testimony. A dark suit or dress is traditional and desirable. Outlandish eye-catching clothing should be avoided. Dress is like a billboard and advertises the wearer's role, status, and personality. The more uniform the clothing, the more it emphasizes the person's role and decreases their personality. The image the expert witness wants to portray for role is professional and competent, for status is middle class, and for personality is pleasing, objective, empathetic, and intelligent.

Another powerful variable apart form the substantive issues during testimony is the expert witness's demeanor. Confident but not cocky. The expert witness is not on trial but their opinion and inferences will be questioned and this can be unnerving. It is best to try not to show too much emotion. Exaggerated displays of emotion are unprofessional and give the appearance of a personal investment in the outcome of the case. The expert witness is an advocate of the facts, not the client

Although dress and demeanor can potentially add or subtract from an expert's credibility, the expert witness should be aware that the most important aspect of testimony is to help the court system by providing accurate, understandable data. An expert witness can look good and sound professional, but not help anyone.

Expert Testimony: The Direct Examination

The school psychologist at this point has implemented best clinical practices; formulated their opinions, conclusions, and recommendations; and painstakingly prepared to present their data in understandable lay terminology. The clinician is then called to the witness stand, sworn in, and questioned by the attorneys representing both the defendant and the plaintiff to establish the witness as an expert witness for the specific case at hand. It is now time to proceed with the direct examination of the expert witness.

The Adversarial Process. The adversarial process is a concept foreign to the mode of operation of most school psychologists. The range of acceptable behavior for attorneys is distinctly dissimilar to that of practitioners in behavioral sciences. The adversarial process places a much different expectation upon lawyers than upon mental health professionals (Schwitzgebel & Schwitzgebel, 1980). "Psychologists present the science of psychology and offer their services, products, and publications fairly and accurately, avoiding misrepresentation through sensationalism, exaggeration, or superficiality." (American Psychological Association, 1981, p. 635). The ethical code of lawyers is much different and charges them to present evidence as one-sided as possible to win their case. The attorney will use any part of the law which will be most beneficial to their case; it is their absolute duty. Within the confines of the law, an attorney will attempt to force the expert witness to make definitive specific statements about behavioral data. This holds for the client's lawyer as well as the oppositions's counsel. School psychologists in the role of the expert witness know there is a range of accuracy in behavioral science which does not allow absolute specificity. This impasse is where lawyers and psychologists clash. Psychologists must be on constant guard to maintain their ethical standards within the adversarial framework of the courtroom.

Advocacy. If the school psychologist believes that they are, in fact, a scientist they they must not be an advocate of a client, a school, or a state agency, but rather an advocate of the data. The expert witness is an advocate of objective facts. The practitioner as an expert witness should be emotionally tied only to providing impartial facts. It is an irrational belief that the expert witness must defend one side or the other. When an independent witness for the court does have strong emotional feelings about a client they frequently respond differently to defendent and prosecution questions which inevitably harms their credibility as an expert witness.

One aspect of advocacy must be clarified. It is generally not considered good practice to become an examiner for a client if that client is also being seen for therapy. As a therapist the practitioner is an advocate for the client, but in the courtroom the school psychologist must become an advocate of the facts. These facts could destroy the therapist-client relationship and ultimately harm the client. Referral at this juncture is usually deemed most prudent. Clarification with the client of the psychologist's role and parameters of confidentiality prior to rendering any professional services is ethically responsible.

Responding to Questions. Under direct examination it is appropriate for the expert witness to look directly at the person asking the questions and respond verbally back to them in a direct, honest and candid manner. It is sometimes difficult to talk about the defendant when they are physically present in the courtroom. This can be rectified by occasionally talking to them during testimony as if giving them feedback on the evaluation. On long responses it is desirable to make eye contact with the judge and jury. On short answers eye contact with all courtroom actors is awkward and the witness could find themselves continually glancing around the courtroom.

The expert witness is required to respond verbally. Hand or head gestures are not acceptable and the court will ask the witness to emit a verbal response.

In giving testimony the expert should be concise so as not to lose the importance of their information with too many words. To promote communication technical jargon should be minimized and elaborated on when its use is absolutely necessary. Professional terminology that has a different lay meaning should be carefully defined. Examples include "depression", "deterioration", and "within normal limits" (Shapiro, 1984). The judge is a trained listener and any condescending or patronizing comments will not be well received. Likewise, the expert witness should refrain from flippant remarks or attempts to be amusing. The expert witness wants to be seen as professional and competent not as a witty comic.

The best verbal response in the world is useless if it is not directed to the question which was asked. The expert witness must listen diligently to the question posed to them before responding. If the question is unclear the witness should request to have it repeated, explained or rephrased. The expert witness has the right to have questions repeated and words or phrases explained.

There are different opinions as to whether an expert witness should answer only the specific question asked or whether the expert should volunteer additional information. The former opinion is based on the thought that the lawyer has a specific order of questions and will use that order to most effectively utilize expert testimony. Breaking that sequence by the expert witness volunteering information will be detrimental to the impact of the testimony. The latter view holds that the expert witness should use questioning as a guide for their responses and present, within general boundaries, that information which they feel is most relevant. At any rate, if the expert witness is asked an

open-ended question they should use that opportunity to build, fortify, and elaborate on their findings and conclusions. Lawyers are frequently taught to never ask "why" questions. According to Shapiro (1984), "why" questions are fair game for the expert witness to take as much time as necessary to explain something as fully as possible. If the expert witness would like to cover more information than requested they can ask for permission to elaborate on the subject. If the attorney says "yes", proceed. If the attorney says "no", it signals the other attorney(s) and judge that the questioning attorney is not being fair and the judge or opposing attorney can follow up with questions and directions to the expert to elaborate. Expert testimony is not like that which is exemplified in television drama. The expert does not have to answer just the question posed. The judge will not allow the lawyers to control what information is introduced. The judge is interested in knowing what helpful information the expert has and this information will be allowed to be aired. Likewise, the judicial system will not stipulate that the expert respond with only a "yes" or "no" answer if that response would be misleading (Cook, 1964).

When the expert witness does not know the answer to a question or does not have an opinion they should not speculate or render a haphazard guess. Rather, they should attempt to rephrase the question to one they can respond to. In regard to giving an opinion, the expert witness should only give opinions when they have carefully considered all available evidence. There is nothing wrong with requesting time to consider new information. To respond without careful deliberation sets the expert witness up for potential difficulties. In addition, making seemingly quick decisions undermines the validity of the professional's carefully thought out considered opinion(s).

The expert witness should be cautious about answering questions with one-word responses. One-word responses, although simple, are open to too many interpretations and assumptions. For example, if the witness responds with "yes" to a question, does this mean "yes" for every situation like this one or just "yes" for this specific instance. In addition, one word answers can build a response set which allows the lawyer to ask many questions very rapidly and allows the lawyer too much control of the direction and rate of questioning. An alternative method of responding for the expert would be to simply repeat or rephrase the question before responding. This provides the witness with more control.

If at a later time in their testimony, the expert witness feels they have previously given misleading or inaccurate information, they should amend their statements as quickly as possible.

Presenting Limitations and Contradictory Data. The expert witness should make a substantial endeavor to anticipate in advance of their testimony what areas of testimony appear weakest and could be challenged (Shapiro, 1984). The expert should then present the limitations of their evaluation and findings and any seemingly contradictory data in a very orderly manner during the direct examination. This is a much more preferred mode of operation than to appear bewildered and distressed by these challenges during cross examination. Handling potential trouble spots during direct examination is more comfortable and controlled than during cross examintion, gives the professional more credibility, and adds to the potential strength of the testimony.

The expert should present the limits of their involvement with the client by describing the dates they saw the client, the number and length of those sessions, and the relationship with the client prior to, during, and after the evaluation. In addition, the expert should further specify the exact nature of that intervention. If for example, the mental health professional did a chemical dependancy evaluation they would not address questions about whether a particular parent should have custody of that child, nor would the court expect them to. An expert witness should not render an opinion on a subject unless they did an evaluation directed toward that particular subject.

When there are apparent contradictions in the data, the expert will want to present these contradictions and how they have reconciled them with their findings during the direct examination. This will demonstrate to the court the expert's awareness of the issues and that the expert has carefully considered them, evaluated their significance, and assimilated that information into the expert's findings and opinions (Shapiro, 1984).

Expert Testimony: The Cross Examination

Cross examination is without question the most feared of all courtroom experiences. And for good reason. Graduate students in their oral defense are treated better and challenged less than an expert on the witness stand. There is no collegial status within the courtroom for a mental health practitioner as an expert witness. The adversarial environment of the legal system is engineered so that at all times one side carefully listens for evidence of support while the other listens to systematically tear testimony down. Some attorneys in their cross examinations use blatant ridicule while others are more effective in methodically weakening or destroying an expert's testimony by more subtle means (Ziskin, 1975). Either way the expert witness had better be prepared and aware of typical attacks, common traps, and strategies to hold their own during cross examination.

The Attack. There are many different techniques attorneys use in cross examination. While some prefer to berate the expert witness personally, other lawyers choose to not assault the opposing professional too adamantly because the repercussion could undermine their own expert witness's testimony. As such, most lawyers tend to be very discriminating about how they cross examine the expert witness (Shapiro, 1984).

To keep the expert witness from becoming defensive and taking cross examination too personally, Shapiro (1984) has offered the following guideline. The attorney's first inclination will be to attack the expert's opinion. If that opinion is strongly supported the attorney will attack the expert's credentials. If the expert's credentials are beyond approach the attorney will then be forced to attack the expert personally. So if the expert feels they are being attacked personally they can feel reasonably confident that their credentials and opinions are sound. This internal frame of reference will allow the expert witness to assess the strength of their case by the level of attack by the cross examining lawyer.

Common Traps. Cross examining attorneys occasionally trap expert witnesses by baiting them with questions about tangential and unrelated information in an attempt to undermine the expert's credibility and testimony. One common trap is for the lawyer to present the expert witness with an unrenowned article or research study and ask the expert if they are knowledgeable of it and how it relates to the particular case. If the expert is aware of the article they should acknowledge it and discuss the findings of the study. If the findings are different than the expert has concluded, the witness should cite other research which supports their findings, be prepared to analyze the study, and state why the findings are not applicable in this case (Shapiro, 1984). If the expert is not aware of the study they should simply state so.

Another typical ploy by the cross examining lawyer is to pose a hypothetical situation and ask the expert to comment about it in regard to the expert's findings and conclusions on the case at hand. This is a trap. As was stated before, the expert should not render an opinion on an evaluation they did not do. The expert witness should state that any hypothetical situation would contain too many unknown quantities and that the professional does not make decisions without careful research, study, and evaluation. Speculation is simply speculation and should not be made by a behavioral scientist without data.

A closely related trap employed by a cross examining lawyer is to ask the expert witness to state a generalization based on the data they compiled during their evaluation. For example, the attorney might say to the expert, "Isn't it possible that based on your observations that . . . could happen"?. Once the expert goes along with this line of questioning they will have a difficult time drawing the line of where to stop. Taken to extremes these generalizations can greatly harm the expert's carefully thought out, considered opinions. One response might be for the expert to declare, "Anything is possible". But this brash comment may be counter-productive, antagonize the lawyer and judge, and not help with the professional image the expert hopes to project. An alternative response which could potentially strengthen the expert's credibility would be, "Although that is possible, given the evaluation which I conducted, it is my opinion that . . . " (Shapiro, 1984).

Cross examining lawyers will also try to isolate one symptom, behavior, or specific test variable and ask the expert witness how that piece of evidence contributed to the expert's opinion. To avoid this trap the expert witness should respond by stating that their opinion was derived by assimiliating the totality of information available to them by many various sources on the individual client and not based on any one specific piece of data.

Expert Witness Strategies. In direct examination the lawyer can not lead the expert witness, but during cross examination the attorney can and will lead the witness. The expert witness must therefore have ready source of proactive strategies to cope with the onslaught during cross examination. The following strategies and suggestions are offered to aid the school psyhologist as they prepare for cross examination.

Preparation, preparation, preparation. The expert witness should know their theoretical orientation, the related literature and research, and be able to adequately describe the assessment process they conducted. The cross examining attorney will probably not attack the expert's conclusions but rather the scientific adequacy of the method used to derive those conclusions (Schwitzgebel & Schwitzgebel, 1980). It is important to remember during cross examination that it is the expert who has the knowledge of the field; and that knowledge can be used to the expert's advantage. Here is an example cross examination interchange from Shapiro (1984, p. 81)

Attorney:	Now then, doctor, hasn't research shown that the MMPI is invalid?
Expert:	I really cannot answer that question; would you be able to define what you mean by validity?
Attorney:	Come now, you're a doctor, don't you know what validity is?
Expert:	Certainly, counselor, but there is predictive validity, construct validity, and face validity - to name only a few. You will have to define your terms more precisely before I can respond to the question.
Attorney:	I withdraw my question.

The expert witness should acknowledge their beliefs, weaknesses, and sympathies honestly and without undue hesitation. The expert need not appear embarrassed by them. Admitting weaknesses will not undermine the expert's credibility and can, in fact, make them more creditable and believable.

The expert witness should respond in terminology which is easily understood by the courtroom participants and resort to esoteric jargon only when absolutely necessary. Many people are skeptical about experts anyway, so the less jargon, the more acceptable the expert and their resulting testimony will be.

As in the direct examination, the expert witness will need to listen to questions carefully during cross examination. If the question can not be answered as asked, the expert should say so and ask to have it rephrased or rephrase it themselves. This latter option gives the witness more leeway and the question can be shaped to fit their response. If the question has more than one part the expert will need to be sure to answer each part specifically. And if the expert has additional information that would be helpful to the case they should also try to work it in.

Cross examining attorneys will attempt to intimidate and control the pace of their questioning. To counter this the expert witness should set their own tempo by pausing to carefully think before responding, and restating or rephrasing the question. In addition, sustained periods of time testifying can be fatiguing, can contribute to nervousness, and can produce anger, carelessness, and a willingness to say anything to get off the stand (Westphal & Kohn, 1984). If the expert senses any of these symptoms, they should request a short recess.

The best preparation of all for cross examination is to thoroughly use direct examination to the fullest. This involves spending time with the attorney who retained the psychologist and planning how to most effectively present the data to provide the most clarity and persuasive presentation possible. The expert should instruct the attorney to follow-up any stated opinions with a question to the expert asking them to state the grounds and basis for the opinion (Shapiro, 1984). This will allow, hopefully in the direct examination, the expert to present as much information as possible to fortify and explain their inferences, interpretations, and conclusions. If this information is deleted from the direct examination and only brought forth during cross examination, the expert will appear defensive and their testimony weaker. The more comprehensive the testimony during direct examination, the less stressful and challenging the cross examination will be.

Other Considerations

Sometimes it is the little pieces of information that separate the good expert witness from the excellent expert witness. The following tidbits are presented to promote the latter.

Rule on Witnesses. It is usual practice during lay testimony for the lawyer to ask the judge for a "rule on witnesses", which means that everyone else testifying on the same concern be excluded from the courtroom to avoid one testimony influencing another. It is entirely within the judge's discretion to determine if they will apply this to expert testimony (Shapiro, 1984). If the judge should apply the rule on witnesses to expert testimony, the expert should not be insulted or upset but rather just accept this as standard courtroom practice and gracefully leave the courtroom chambers.

Fee Considerations. To avoid any misunderstandings a fee for the expert's evaluation, report writing, prepartion, and testimony should be established and paid before actual testimony takes place. This will eliminate any possible implication that the fee is contingent upon the expert's testimony which could be challenged in court (Schwitzgebel & Schwitzgebel, 1980). However, it is certainly appropriate for the expert to submit a bill for their time in court afterwards, as they would for any professional service they provide.

Unexpected Outcomes. Sometimes court rulings are hard to understand. No matter how prepared the expert witnesses is and how impressive their court preformance, the court can rule in a seemingly unpredictable and incomprehensible manner. This can happen for a number of questionable, uncontrollable, and fortuitous reasons. For one thing, judges are only human. The particular judge may have had previous contact with the defendant or plaintiff either in or out of the legal system which could be either beneficial or detrimental to their case. Or the person on trial could be a well-known personality in town. This too could be good or bad.

Also, facts today are not facts tomorrow. History is laden with examples of undeniable truth, scientifically proven and backed by the best minds, only to be ridiculed, abandoned, and scientifically disproven at a later date. It is for this reasoning that the field of law is extremely cautious in accepting an absolute, ultimate truth until demonstrated unquestionable by the passage of time (Cook, 1964).

In addition, even if the court does accept a scientific opinion from the expert they may rule against the expert's recommendations because other facts which came out during the trial, possibly concealed from the expert, make it improbably that the expert's information is prevalent or valid. Usually the trier of fact does not totally neglect the expert's information, but rather exerts that the expert has not carried their burden of proof to the degree stipulated by law (Cook, 1964). In civil cases the law requires tht the proponderance of evidence be demonstrated, while in criminal law the data must be shown to be beyond a shadow of doubt.

Furthermore, in regard to child welfare cases, the hearing officer is an advocate for the child and may elect to recommend a course of action different from the positions recommended by any of the parties involved. This can lead to some creative and unanticipated resolutions.

Whatever the outcome, the expert witness should remember that it is their charge to function as an advocate of the facts as they have perceived them, and to present this information in as clear and meaningful terms as possible. The rest is out of their hands and the charge of the court system.

THE WRITTEN COURT REPORT

Just as in the expert's testimony, the fundamental purpose of the expert's written report is to provide useful and relevant information to the court to assist the legal system in making an informed judicial decision. When the expert witness provides testimony along with their submitted written report they can expound upon any aspects of the document that are unclear and answer directed questions that may be elicited. However, when the written court report must represent the expert in their absence, that document must be comprehensive in scope and balanced with concise and forthright content. The following information, suggestions, and considerations are presented to assist the school psychologist in constructing and submitting their written court report.

The Comprehensive Report

In their day to day practice most school psychologists are involved in multidisciplinary team approaches to assessment, decision making, program planning, and recommendation implementation. The team approach as specified in Public Law 94-142, the Education for All Handicapped Children Act of 1975 (Federal Register, 1977), provides protection and an assurance of checks and balances by drawing on a variety of perspectives from different disciplines. In addition, when there is a multidisciplinary team approach the individual written reports are seen as parcelled fragments of information that converge to give an overall comprehensive picture of the individual client. But in many civil and criminal law cases, the psychologist does not have the luxury of the multidisciplinary team assessment and resulting written documentation. In fact, in many such cases, the psychologist's submitted written report is entered into court as the only input from an expert mental health practitioner. This can greatly increase the potential impact and importance of the psychologist's report and the responsibility of the school psychologist in court interventions.

The Court Report versus the Traditional Psychological Report. There are as many acceptable court report writing formats and styles as there are traditional psychological report writing formats and styles. It is of utmost importance that the written report is tailored to the individual client and case, not the converse where the individual client is fitted into a predetermined model of reporting. The report writing format and style offered here as an alternative has been found well-suited to the court system and a particularly useful model for this writer. It is presented for adaptation by the reader.

The comprehensive court report utilizes most of the typical sections of the traditional report with the addition of several distinctive features. The first distinctive feature of a good court report is that it clearly identifies the REASON FOR REFERRAL by specifying in detail what questions the report will address. After specifying the questions to be addressed, the court report should delineate the PURPOSE AND SCOPE OF THE EVALUATION. This sets the structure for the intervention which is conducted and the format for how data will be presented in the report.

Another imporant feature of the court report is the REVIEW OF RELEVANT HISTORY AND CURRENT DATA. The wording "relevant" should be highlighted because as a comprehensive report the psychologist should exhaustively search for relevant background information but not pad the document with unnecessary information. It is considered unethical to provide the court with interesting or unusual information which is not relevant to the courts disposition. A client's right to confidentiality should be protected even when authorization to release information has been granted, thus information released should be directly pertinent to the case. Since this report may be the only professional opinion entered into the court record, a complete psycho-social history should be taken but again only with pertinent information presented. This section should carefully list the sources and informants consulted to gather the background information.

The next section of the court report usually contains the CLINICAL INTERVIEW and notes about the client's BEHAVIOR DURING THE EVALUATION. The dictinction between this section and that usually reported in a school psychological report is the additional reporting of a client's mental status. A mental status examination consists of assessing the client's dress, grooming, and general appearance; degree of cooperation; emotional responses, affect and mood; thought content; orientation as to person, place, and time; memory and attention; language usage; and the professional's general impression of the client.

The ASSESSMENT section should use as comprehensive a battery of formalized assessment instruments as are necessary to obtain the appropriate data without over evaluation.

The final and most important section of the written court report is the SUMMARY AND RECOMMENDATIONS. It is most important because it is often the first, and sometimes only, section thoroughly read. The whole report should be written to support and focus on this section. The summary should synthesize and converge all the relevant information into a concise and forthright presentation. The recommendation(s) should anwswer each of the questions posed in the reason for referral section in terms of conclusions, opinions, and specific recommendations.

The Evaluation Report versus the Data Report. When a psychologist is retained by the judicial system the court is asking for an expert opinion. A data report which clerically reports uninterpreted data is of little use and does not meet the needs of the legal system. The expectation of a professional court report is that it will address specific recommendations that will answer the referral questions. The court demands an expert's professional opinions, inferences, and recommendations and that is what the school psychologist should include in their evaluation report.

Technical Specificity. It is very helpful to know in advance the target audience for the written court report. For most instances court reports should be straightforward and free of technical jargon. There are situations, however, such as when there is a nonjury trial, and the judge is particularly sophisticated in psychological testimony and terminology, that it is appropriate to present data in a more technical report writing style. Even so, the psychologist should keep in mind that any good written report should meet the criterion of communicating well.

Clarity Through Graphs and Charts. To aid in communicating psychological data to the court in the written report, the visual impact of graphs and charts can be very helpful. This means of presentation can be especially advantageous in comparing the referred client to a normative population.

Submitting the Written Court Report. To alleviate any difficulties or misunderstandings, the intended recipients of the written court report should be clarified and stipulated prior to the expert initiating their evaluation of the client. In addition, it is ethically responsible for the psychologist to notify the client prior to the evaluation how the information obtained during the evaluation will be utilized and what parties will be exposed to it. After the evaluation has been completed and the report written, it should then be delivered to the specified recipients in keeping with the time-table previously established.

Sample Written Court Report

PSYCHOLOGICAL REPORT

Name: Kathy H.
Date of Birth: 10-20-67
Chronological Age: 17-00
Dates of Service: October 8, 9, 10, 1984

Parents: Bob and Susan H.
Address: 103 N. Curtiss Avenue
School: Undetermined
Grade: Ninth

REASON FOR REFERRAL: This referral was initiated by Betty L., a social worker with the Iowa Department of Human Services, and a referral review conference was held on 8-14-84 at DHS. The referral was made because Kathy had been the victim of an abusive situation, had consequently moved frequently, and had most recently run away from a new foster home placement and school setting. The major goals of this referral were identified as assessing Kathy's eligiblity for special education services within the school and providing personality information on Kathy to DHS to be utilized in making a residential placement decision. These personality variables could also be potentially useful in determining other treatment strategies such as group and/or individual counseling.

More specifically, this report will answer the following questions:

1) Does Kathy continue to qualify as a learning disability student according to the current Iowa definition?
2) What type of residential treatment program would be most beneficial for Kathy at this time?
3) What other services should be considered for Kathy?

PURPOSE AND SCOPE OF PSYCHOLOGICAL EVALUATION: This Diagnostic Assessment will address the following:

1) Review of relevant history and current data.
2) Clinical interview/behavior during evaluation.
3) Intellectual assessment (Wechsler Adult Intelligence Scale-Revised)
4) Educational assessment (Selected subtests of the Woodcock-Johnson Psychoeducational Battery)
5) Personality assessment (Minnesota Multiphasic Personality Inventory and Thematic Apperception Test)
6) Summary and Recommendations

REVIEW OF RELEVANT HISTORY AND CURRENT DATA: (Sources of Information: Kathy H., DHS records, school cumulative file) Kathy began her school career in Fort Lauderdale, Florida where she attended kindergarten for two years because she had difficulty with the lack of structure in the kindergarten program. She attended first grade in Florida and then moved to Ohio where she was enrolled in second, through fifth grade. Kathy then moved to Hudson, Iowa, and attended sixth, seventh, and half of eighth grade. She then moved again midyear (January 1984) to Lincoln, Nebraska and completed eighth grade. Kathy moved back to Iowa this summer and was placed at Runaway service for evaluation. This fall, Kathy was placed in a foster care home in Ogden, Iowa where she started school in ninth

grade. Shortly after starting school Kathy ran from her foster home placement and was placed at Runaway Service again for evaluation. Kathy is presently at Runaway Service pending a court hearing to determine her residential placement.

While in the Hudson schools Kathy was staffed into a learning disabilities program with goals to develop skills in written expression, independent study skills, organizational skills, and socialization skills (peer relationships). According to the school records, Kathy has never been staffed out of the Resource Room program.

During the timespan Kathy was in the Hudson schools, she was the victim of an extensive amount of abuse in her home setting by her father which dramatically affected Kathy. The reader is directed to contact the Iowa Department of Human Services for a more detailed account.

CLINICAL INTERVIEW/BEHAVIOR DURING EVALUATION: Kathy arrived at the appointed hour, conversed easily and demonstrated good social skills with an adult. Kathy was appropriately dressed and groomed for an adolescent her age, and exhibited age-appropriate discussion. She was oriented as to person, place and time, and her emotional responses were appropriate for the situation. Kathy gave the impression of a personable, shy, quiet, and pleasant young woman of average to low-average mental ability. Although Kathy maintained good eye contact, her demeanor reflected a poor self-concept. Kathy was self-motivated to do her best on the evaluation and was persistent in task completion. Kathy's gross and fine motor functioning were adequate as was her articulation and syntax.

Kathy was very open about her feelings of deciding to give up her baby. She appeared to be searching for support and I encouraged her to continue to discuss this with her therapist at the Community Mental Health Center. Kathy said she enjoys reading romantic stories, likes pretty, feminine things, and writes poetry when she feels down. When requested to recite one of her poems, she could not do so. Kathy indicated that her sister is strung out on drugs and that, at one time, she too was a heavy user. Kathy stated that she has tried amphetamines, marijuana, and LSD, but does not use anymore. Kathy did admit that she smoked cigarettes frequently.

Kathy reported that she has had responsiblity for grocery shopping, laundry, and ironing and can independently prepare and cook a variety of foods. Kathy stated that she would like to complete high school and become involved in the Army Reserve. Apparently she has several friends in the guard for two days per month, and it sounds appealing to her. When questioned about other vocational plans, Kathy was unsure, but responded that she would like to work with children.

Kathy said that she received corrective lenses four years ago and was told to be re-examined in two years. She has not done so and does not now wear her glasses.

INTELLECTUAL ASSESSMENT: On the Wechsler Adult Intelligence Scale-Revised (WAIS-R), Kathy secured a Verbal Scale IQ score of 93 ± 3.5, a Performance Scale IQ score of 92 ± 5.0, for a resultant Full Scale IQ score of 92 ± 3.0. This Full Scale IQ score places Kathy in the average range of mental ability. When compared to the population as a whole, Kathy earned the following scaled scores:

Verbal		Performance	
Information	4	Picture Completion	9
Digit Span	6	Picture Arrangement	11
Vocabulary	8	Block Design	7
Arithmetic	6	Object Assembly	8
Comprehension	12	Digit Symbol	8
Similarities	9		

When compared to people of her own age group, Kathy earned the following scaled scores:

Verbal		Performamce	
Information	6	Picture Completion	9
Digit Span	6	Picture Arrangement	12
Vocabulary	10	Block Design	8
Arithmetic	6	Object Assembly	9
Comprehension	14	Digit Symbol	8
Similarities	10		

EDUCATIONAL ASSESSMENT: On the Woodcock-Johnson Psycho-Educational Test Battery, Kathy achieved the following:

Reading Cluster Score	4.4 Grade Placement	82 Standard Score
Mathematics Cluster Score	9.4 Grade Placement	97 Standard Score
Written Language Cluster Score	6.2 Grade Placement	87 Standard Score

PERSONALITY ASSESSMENT: On the Minnesota Multiphasic Personality Inventory (MMPI), Kathy's profile was valid. She scored similarly to other seventeen-year-old females who are characterized as open and blunt in speech and manner. A general negative self-image and realization of a need for psychological assistance was demonstrated by her profile. Individuals who obtain similar profiles are often viewed as energetic and active, mildly independent and non-conforming. This profile suggests the presense of defenses which may lead to the misperception of social situations and in many individuals they demonstrate this by outright suspiciousness, distrust, and brooding. In addition, resentment over real and/or imaged wrongs may be present, as well as feelings of persecution and maltreatment. Individuals who obtain similar profiles have difficulty expressing emotions in modulated fashion and use projection to excess. They can overreact to environmental stimuli and often exhibit poor behavioral controls. These individuals often have an insufficient capacity for delay, which is accompanied by irritability and ready anger

at minor obstacles and frustrations. Such individuals are often seen as restless, impulsive, and as having scattered interests and energies. These individuals often form quick, superficial relationships and manifest intense, but short-lived enthusiasm for their various plans and undertakings.

On the Thematic Apperception Test (TAT), Kathy's responses portrayed conflicts between what she felt was externally expected of her by others, and what she internally desired. Kathy indicated a feelng of significant outside pressure and accusation, and dealt with these by isolating herself, self-blame, and ruminating about past mistakes. Kathy appeared to be guilt-ridden about past traumatic experiences and demonstrated a need and desire to work them out. Kathy's responses portrayed a person who felt that the world was a very scary place and whose only coping strategy was to run away, either externally through physical flight or internally through self-imposed isolation. Kathy did respond similarly to others who have expressed suicidal ideation. Kathy's responses alternated between representing a pessimistic view of the future and an optimistic view which was exaggerated to the point of being unrealistic.

SUMMARY AND RECOMMENDATIONS: As can be seen by the above evaluation, Kathy is a seventeen year-old-female of average cognitive ability, whose education and home life have been dramatically disrupted in the past couple of years. In response to the referral question stated above, information was gathered and the following recommendations are made:

1) Kathy continues to qualify as a learning disability student in the areas of reading and written language according to the current Iowa definition. (This definition of learning disabilities takes into account Kathy's average mental ability and her reading grade placement of 4.4 and written language grade placement of 6.2). Because of the interruption that Kathy has experienced in her education, it will be imperative that she receive Resource Room assistance as soon as her school placement is made.

2) In response to residential treatment, Kathy has several needs and characteristics which should be considered in a placement decision. Kathy has a strong need for a safe, stable, and structured environment. This environment needs to be safe in the sense of freedom from real or imagined harm, stable in that the placement should be of long enough duration to build interpersonal relationships and not leave Kathy feeling bounced around, and structured in the sense of a consistent set of behavioral rules. Kathy has experienced real trauma in her life and will continue to need support in working her feelings out. This takes time and understanding, and could be taken too personally by a foster family. In addition, it would be beneficial for Kathy to interact on a daily basis with other peers. These peers could serve as positive role models and help Kathy interpret social situations in proper perspective. Also, because of Kathy's propensity for self-imposed isolation through either running away or withdrawal, a residential facility with backup staff would be advantageous. Based on this evaluation, a residential treatment facility with the above characteristics would appropriately meet Kathy's needs.

3) Other services to be considered for Kathy include:

a) Individual counseling: Kathy would continue to benefit from her existing individual counseling, focused on confronting her irrational self-blame and low self-image, and ruminating about past mistakes, teaching her positive stratgies to cope with perceived outside presures, and teaching her appropriate techniques to handle frustrations. In addition, Kathy's suicidal ideation should be assessed and followed up.

b) Group Counseling: Kathy could benefit from participation in an experience which offered group support and taught specific social skills regarding building and keeping true friendships.

c) Vocational exploration: Kathy is seventeen years of age with few high school credits. It might be unrealistic to believe she will complete a regular school curriculum. At this time, it is important to assess Kathy's vocational interests and skills, and plan for actual work experiences. This would be advantageous whether she continues her formal education or plans an alternative route.

d) Eye examination: Kathy reported the need for corrective lenses, but does not currently wear them.

Dr. James M. Stumme
Licensed Psychologist
Certified School Psychologist

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